WRIGHT, FINLAY & ZAK, LLP R. Samuel Ehlers, Esq. Nevada Bar No. 9313 2 Ramir M. Hernandez, Esq. 3 Nevada Bar No. 13146 7785 W. Sahara Ave., Suite 200 4 Las Vegas, NV 89117 (702) 475-7964; Fax: (702) 946-1345 5 rhernandez@wrightlegal.net 6 Attorneys for Defendant, Select Portfolio Servicing, Inc. 7 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 8 9 DANNY KASTER, Case No.: 2:19-cv-02180-RFB-VCF 10 Plaintiff, JOINT MOTION TO EXTEND 11 **DEADLINE TO RESPOND TO** PLAINTIFF'S MOTION TO COMPEL VS. 12 (THIRD REQUEST) SELECT PORTFOLIO SERVICING; 13 INNOVIS DATA SOLUTIONS, INC.; AND 14 FORD MOTOR CREDIT COMPANY LLC. 15 Defendants. 16 Plaintiff, Danny Kaster ("Plaintiff"), and Defendant, Select Portfolio Servicing, Inc. 17 ("SPS") (collectively the "Parties"), by and through their counsel of record, hereby stipulate and 18 agree as follows: 19 On March 20, 2020, Plaintiff filed his Motion to Compel [ECF No. 27]. As such, SPS' 20 deadline to respond to the Motion to Compel was originally April 3, 2020. The parties then 21 jointly moved the Court to extend the deadline to April 10, 2020 [ECF No. 29]. The parties then 22 jointly moved the Court to extend the deadline to April 24 [ECF No. 34]. The Parties have 23 discussed extending the deadline for SPS to respond to Plaintiff's Motion to Compel by an 24 additional one week to allow SPS additional time to respond to the Motion to Compel. The 25 parties are discussing a possible resolution to their discovery dispute and believe they can either 26 partially or fully resolve with the additional time. They are also discussion a global resolution of

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WHEREAS, the Parties hereby stipulate and agree to extend the deadline for SPS to file

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the entire matter.

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1	its response to Plaintiff's Motion to	o Compel to May	, 1, 2020.	
2	This is the third stipulation for extension of time for SPS to file its response to the Motion			
3	to Compel. The extension is requested in good faith and is not for purposes of delay or prejudic			
4	to any other party.			
5	DATED this 24th day of April, 2020.			
6	WDICHT FDU AV 0 ZAV 111	D	WHENDED 6 C	
7	WRIGHT, FINLAY & ZAK, LL	P	KNEPPER & CI	LARK LLC
8	/s/ Ramir M. Hernandez, Esq.		/s/ Miles N. Clar	
9	R. Samuel Ehlers, Esq. Nevada Bar No. 9313		Matthew I. Knep Nevada Bar No.	
10	Ramir M. Hernandez, Esq.		Miles N. Clark, 1	
10	Nevada Bar No. 13146		Nevada Bar No.	13848
11	7785 W. Sahara Ave., Suite 200		Shaina R. Plaksi	•
12	Las Vegas, NV 89117 Attorneys for Defendant, Select P	artfalia	Nevada Bar No.	13935 nne Ave., Suite 170-109
	Servicing, Inc.	στησιισ	Las Vegas, NV 8	
13			•	uintiff, Danny Kaster
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16			IT IS SO ORDE	RED:
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			Cont	
18			UNITED STATE	ES MAGISTRATE JUDGE
19	4-24-2020			
20	DATED:			
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	Page 2 of 3			
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**CERTIFICATE OF SERVICE** I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing JOINT MOTION TO EXTEND DEADLINE TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL (THIRD REQUEST) on the 24th day of April, 2020, to all parties on the CM/ECF service list. /s/ Lisa Cox An Employee of WRIGHT, FINLAY & ZAK, LLP Page 3 of 3